

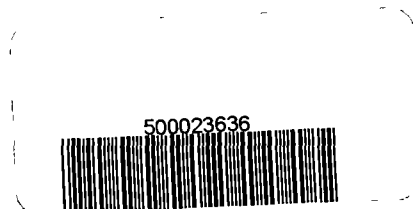


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

OCT 04 2016

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED, #9590 9401 0007 5205 8869 18**  
**GENERAL NOTICE LETTER**  
**URGENT LEGAL MATTER - PROMPT REPLY NECESSARY**

Stuart Transportation Company  
Registered Agent  
National Registered Agents, Inc., of MD  
351 W Camden Street  
Baltimore, Maryland 21201



**Re: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana;  
CERCLIS #: LAD008434185; General Notice Letter**

Dear Madam/Sir:

The purpose of this letter is to provide Stuart Transportation Company (hereinafter is referred to as "Stuart Transportation Company" "you" or "your"), with written notice of your potential liability at the SBA Shipyard Superfund Site ("Site") located in Jennings, Jefferson Davis Parish, Louisiana. Information available to the U.S. Environmental Protection Agency ("EPA" or the "Agency") indicates that Stuart Transportation Company may be responsible for the cleanup or costs of cleanup of the contamination found at the Site under the Comprehensive Environmental Response, Liability, and Compensation Act ("CERCLA").

Under CERCLA, the EPA is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. The EPA has documented that such a release or threat or release has occurred at the SBA Shipyard Superfund Site. The EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site.

**Explanation of Potential Liability**

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health and welfare or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site. PRPs include current and former owners and operators of the Site, as well as persons who sent or transported hazardous substances to the Site for disposal or treatment or who arranged for the disposal or treatment of hazardous substances at the Site.

Based on the information collected, the EPA believes that Stuart Transportation Company may be liable under Section 107(a) of CERCLA, with respect to the SBA Shipyard Superfund Site, as an arranger, who by contract or agreement, arranged for the disposal, treatment, or transportation of hazardous substances at the Site.

## Site History

The Site is situated on approximately 98 acres of land located in a rural-industrial area at 9040 Castex Landing Road, Jennings, Jefferson Davis Parish, Louisiana 70546. The Site is within Section 19 of Range 2W, Township 105 and is located at the end of Louisiana Highway 3166) which is on the west bank of the Mermentau River. The Site is approximately four miles southeast of downtown Jennings and two miles southwest of the village of Mermentau. The Site is bordered to the north by residents, south and west by wetlands, and east by the Mermentau River and wetlands.

The Site primarily consists of two separately-owned parcels of property, one southern and one northern. The southern and northern properties are generally divided by a property line that runs just north of the large barge slip. Suzanne Smailhall Cornelius, (heir of Louis Smailhall, principal of SBA Shipyards, Inc.) and SBA Shipyards, Inc. (now inactive) own the southern property, which historically was operated as a barge cleaning operation. Bunge Street Properties, LLC, f/k/a Leevac Shipyards, Inc., owns the northern property, which historically was operated as a vessel construction and repair operation.

SBA Shipyards, Inc. ("SBA") began operations at the Site on about 1965. Initially, it performed vessel construction and repair operations on what is now the northern parcel. In the 1970s, SBA constructed the graving dock on the northern parcel and dredged the barge slip and constructed the barge cleaning facility on what is now the southern parcel. Leevac Shipyards, Inc. ("Leevac") entered into a lease with option to purchase for the northern vessel construction and repair facility with SBA in 1993. Leevac operated vessel construction and repair operations on the northern parcel beginning in 1993. Leevac then exercised its option to purchase in 1998 and acquired the northern parcel at that time and continued its operations. SBA continued to operate its barge cleaning operations on the southern parcel up until approximately 2006, when Mr. Smailhall died.

Vessel construction and repair utilized two launch slips with on-land rails to haul and launch vessels and eventually a graving dock with a moving gate where a vessel could enter and the dock de-watered to allow construction and repairs on dry land. Both SBA and Leevac activities included sandblasting, cutting and painting, as well as fabricating and repairing vessels. Barge cleaning operations were conducted by SBA only on the southern parcel. SBA converted a small barge placed on land adjacent to the barge slip into its "boiler barge," which it used to generate steam for use in cleaning barges and it also served as the barge cleaning control room.

SBA cleaned barges and other vessels that had contained as last cargos a variety of materials, including, but not limited to acrylates, asphalt, carbon tetrachloride, coal tar, coke oven tar, carbon black, carbon oil, , caustic soda, creosote, cumene, black oil and black oil slop, bunker crude, diesel fuel, heavy grease, waste water, ethyl acrylates, kerosene, lube oil, methanol, number 6 oil , rust, scale, styrene, sour gas oil, soy bean oil, sulphuric acid, tallow, and vinyl acetate.

SBA used a large partially buried barge, as well as above-grade tanks constructed from cut-up barges, to store liquids, sludges, solids and other materials during the barge cleaning process. SBA also constructed and used an unlined surface impoundment called the Oil Pit to store liquids, sludges, solids and other materials. Aside from the Oil Pit, SBA used three other unlined surface impoundments, called Water Pits 1, 2 and 3, to receive wastewater, sludges and solids from the barge cleaning process.

In December 10, 2002, EPA entered into an Order and Agreement for Interim Measures/Removal Action (IM/RA) of Hazardous/Principal Threat Wastes at SBA Shipyards, Inc., Docket No RCRA-6-2002-0908, pursuant to RCRA Section 3008(h) ("2002 Order/Agreement") with SBA and SSIC Remediation, LLC ("SSIC"), an entity formed by certain former customers of SBA's barge cleaning operations to conduct this work. Interim removal activities were conducted from March 2001 through January 2005 under the 2002 Order/Agreement. Interim removal activities consisted of the removing, solidifying, and recycling and/or disposing off-site the waste in the Oil Pit and Water Pit 2 and then over-excavation of the Oil Pit and Water Pit 2; removal and scrapping of above ground storage tanks; draining and refilling of Water Pit 3; removing all pumpable materials from the partially buried barge and disposing those materials off-site, then welding shut all hatches to that barge; and surface scrapping of all visible materials from a former land treatment unit (FLTU). By letter dated February 24, 2006, EPA Region 6's RCRA branch reviewed and approved the completion report of the IM/RA activities and concluded that the completion report fulfilled the 2002 Order/Agreement. The IM/RA, however, was intended as an interim response; hazardous substance remained onsite after the IM/RA.

In October 2012, the U.S. Coast Guard and the LDEQ responded to a reported release at the barge cleaning portion of the Site from an attempt to scrap the "boiler barge" and the partially buried storage barge by parties contracted by the owner of the southern portion of the Site. During 2014 to 2015, EPA conducted a CERCLA emergency removal action and an Oil Pollution Act of 1990 removal action after LDEQ reported barge scrapping activities and releases of visible liquids at the Site

Between December 2012 and September 2014, EPA conducted a preliminary assessment, site inspection, and expanded site inspection. As part of EPA activities, the Agency conducted sampling activities at the Site. During those site activities, EPA sampling documented releases or threats of releases of hazardous substances in the subsurface and groundwater of the Site, the Mermentau River, and wetlands surrounding the Site. Numerous hazardous substances were identified at the Site including petroleum hydrocarbons, numerous polycyclic aromatic hydrocarbons, dioxins/furans, metals, and volatile organic compounds. Petroleum and non-petroleum substances found at portions of the Site are or were comingled.

### **Information to Assist You**

The EPA would like to encourage communication between you, other PRPs, and EPA at the Site. The EPA is in the process of negotiating a remedial investigation/feasibility study administrative settlement and order on consent ("ASAOC") for the Site with some of the potentially responsible parties. If you'd like to discuss the opportunity to join this ongoing settlement, please contact counsel representing the group of potentially responsible parties below within **30 days** of receipt of this Notice Letter:

Michael A. Chernekoff  
Partner  
Jones Walker LLP  
1001 Fannin St., Ste. 2450  
Houston, Texas 77002  
(713) 437-1827  
[mchernekoff@joneswalker.com](mailto:mchernekoff@joneswalker.com)

We encourage you to give this matter your immediate attention and request. The EPA plans to finalize the ASAO after the 30-day response period for this General Notice. If you choose not to join the ongoing settlement discussions or pursue other options to satisfy your potential liability with the EPA, the EPA will evaluate enforcement options, including issuing special notice letters to all potentially liable parties known to the EPA at that time.

Also included in this letter to assist you are: the evidentiary documents as Enclosure A; the Small Business Resource Fact Sheet as Enclosure B; and the parties receiving this letter as Enclosure C.

### **Financial Concerns/ Ability-to-Pay Settlements**

The EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. In accordance with Section 122(g)(7) of CERCLA, 42 U.S.C. § 9622(g)(7), the EPA will review financial information that you submit in order to determine whether you have an inability or a limited ability to pay response costs incurred at the Site. As part of this review, the EPA will take into consideration your overall financial condition and demonstrable constraints on your ability to raise revenue. Based upon the financial information that you may submit, EPA will determine whether it can qualify for a reduction in the settlement amount and/or an alternative payment method within the meaning of Section 122(g)(7) of CERCLA, 42 U.S.C. § 9622(g)(7).

If you believe that you qualify for a reduction in any settlement amount and/or alternative payment amount under the criteria described in the paragraphs above, please contact Mr. Talton, at 214-665-7475 for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements and an information request for your relevant financial information, and you will be asked to submit financial records including business federal income tax returns. If the EPA concludes that you have a legitimate inability to pay the full amount of the response costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that because the EPA has a potential claim against you, if your financial status changes in any significant way, e.g., filing for bankruptcy, you must include the EPA as a creditor. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

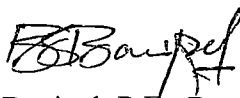
### **Resources and Information for Small Businesses**

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may download a copy of the law at <http://www.gpo.gov/fdsys/pkg/PLAW-107publ118/pdf/PLAW-107publ118.pdf> and review the EPA guidance regarding these exemptions at <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>.

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at <http://www.epa.gov/compliance/compliance-assistance-centers>. In addition, the EPA Small Business Ombudsman may be contacted at <http://www.epa.gov/resources-small-businesses/forms/contact-us-about-resources-small-businesses>. Finally, the EPA has developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA) and information on resources for small businesses, which is enclosed with this letter as Enclosure B and available on the Agency's website at <http://www.epa.gov/compliance/small-business-resources-information-sheet>.

Thank you in advance for your cooperation. We look forward to working closely with you in the future. If you have any questions regarding the notice or any of the documentation included, please contact Mr. Talton at 214-665-7475 or [talton.chuck@epa.gov](mailto:talton.chuck@epa.gov). Questions concerning legal matters should be directed to the EPA site attorney, Ms. I-Jung Chiang, at 214-665-2160 or [chiang.i-jung@epa.gov](mailto:chiang.i-jung@epa.gov). Thank you for your attention to this matter.

Sincerely yours,



Ben Banipal, P.E., Branch Chief  
Technical and Enforcement Branch  
Superfund Division

**Enclosures:**

- A Evidentiary Documents
- B Small Business Resource Fact Sheet
- C Parties Receiving General Notice letter

# MARINE CHEMIST CERTIFICATE

SERIAL NO. B134856

W.O. 881

Stewart Transp. Co.

1-11-85

SBA SHIPYARD

Survey Requested by

Vessel Owner or Agent

Date

TC-20

TANK BARGE

SBA MORMENTAU

Vessel

Type of Vessel

Specific Location of Vessel

CRUDE OIL

JKI CEMB.

3:30 PM

Last Three (3) Cargoes

Test Method

Time Survey Completed

ALL CARGO TANKS (U-SPACES) AFTER RAKE

SAFE FOR WORKERS

SAFE FOR HOT WORK

AIR BLOWER REQUIRED

IN WORK TANK (min 1000 CFM)

CARGO Lines & DEED WELL PUMP - OPEN, & JOINED

STEAM COILS

Air blowing, SAFE FOR HOT WORK

FORWARDED RAKE

OTO LEL, some coating,  
SCOPE in way of work,  
HAVE FIRE WATER WITH  
CHARGED FIRE HOSE, THEN  
SAFE FOR WORKERS  
SAFE FOR HOT WORK

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the writer signed Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list, paraphrased from NFPA 306-1980, Subsections 1-6.1 through 1-6.4, and Subsection 5-3.2).

**SAFE FOR WORKERS:** Means that in the compartment or space so designated, (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and (b) toxic materials in the atmosphere are within permissible concentrations; and that (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, (a) the oxygen content of the atmosphere is less than 19.5 percent by volume; or (b) the concentration of flammable materials in the atmosphere is above 10 percent of the lower flammable limit (LFL) of the most flammable material present; or (c) the concentration of toxic materials in the atmosphere is above the permissible exposure limit (PEL) of the most toxic material present.

**SAFE FOR HOT WORK:** Means that in the compartment or space so designated, (a) the oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit (LFL) of the most flammable material present.

**SERIAL NO.** 1000

Row 1112 - Approx. 100 ft. - 100 ft. - 100 ft.

Capit. T. 1/2

1-2-3-4-5 12/5. CHILL. HAZARD BOTTOMS - SAFE FOR WALKING  
SAFE FOR HAZARD FOR WALK PERMANENTLY  
WITH FIREWORKS IN THE FIREWORK  
ON SAND-BY.

10-11-12-13-14-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000-1001-1002-1003-1004-1005-1006-1007-1008-1009-1010-1011-1012-1013-1014-1015-1016-1017-1018-1019-1020-1021-1022-1023-1024-1025-1026-1027-1028-1029-1030-1031-1032-1033-1034-1035-1036-1037-1038-1039-1040-1041-1042-1043-1044

No 1 P<sup>e</sup> 3 P13 - C T LEL: HSPHAT 2 ET M<sup>e</sup> - SPT FILLING  
No 1 S - O K LEL: SPT HSPHAT 2 CON CH ON B T M<sup>e</sup> SPT FILLING

No. 2 P/S - 0% L&L - Call for Bids - Vertigation Resurf  
For E&T

Pump Room - Lat. Fr. WORKERS - OFFICER & 1st TAILOR

DUPLEX BOTTOM & TONGUE ARM - SEE F.H. HALLER P. 100  
SUGGEST FOR DYNALON EXTENDED BOTTOM SHOWN PHOTO  
FOR WAT. H. WITH CHARGE FIRE HOSE READY ON STAND-BY

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe, lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heading coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**SAFE FOR WORKERS:** Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained, as directed on the Marine Chemist's Certificate.

**SAFE FOR HOT WORK:** Means that in the compartment so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that: (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated: (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**"The undersigned acknowledges receipt of this Certificate under Section 2-3 of NFPA 306-1980 and understands conditions and limitations under which it was issued."**

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed _____			Signed _____		
Name _____	Company _____	Date _____	Name _____	Company _____	Date _____

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

SERIAL NO. D 46226

Survey Requested by *Springfield Transportation Co.* Date *1-7-97*  
 Vessel *STL 003* Type of Vessel *TANK BARGE* Specific Location of Vessel *SEA MICHIGANES LA.*  
 Last Three (3) Cargoes *COAL* Test Method *COAL* Time Survey Completed *2:15 PM*

*PORTABLE AIR VENTILATION REQUIRED IN WORK TANK.*  
*BOW RAKE*  
*STERN RAKE*  
*AFTER HOT OIL TANKS P/S* - *SAFE FOR WORKERS*  
*AFTER DIESEL OIL TANKS P/S* - *SAFE FOR WORKERS*  
*ENGINE - BOILER ROOM*  
*DOUBLE BOTTOMS*  
*No. 1 & 2 P/S* - *SAFE FOR WORKERS* - *SAFE FOR HOT WORK*  
*CARGO TANKS* - *SAFE FOR WORKERS* - *SAFE FOR HOT WORK*  
*No. 1-2-3-4 P/S* - *FIREFIGHTING WITH CHARGED FIREHOSE*  
*REQUIRED AT WORK LOCATION.*  
*DECK HOT OIL TANK - OIL - NOT SAFE FOR HOT WORK.*  
*Hot Oil Coils - SAFE FOR HOT WORK*  
*CABLE LINES - SAFE FOR HOT WORK IN BULK BARGE, AND DROP LINES*  
*AND THEN SAFE FOR HOT WORK ON LINES.*  
*DECK WALLS (2) - NOT SAFE FOR HOT WORK - ISOLATED*

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list, paraphrased from NFPA 306 Subsections 1-6.1 through 1-6.4, and Subsection 5-3.2)

**SAFE FOR WORKERS:** Means that in the compartment or space so designated (a) the oxygen content of the atmosphere is at least 19.5 percent by volume, and that, (b) toxic materials in the atmosphere are within permissible concentrations, and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**SAFE FOR HOT WORK:** Means that in the compartment so designated (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed, and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit, and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate, and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**CHEMIST'S ENDORSEMENT.** This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

"The undersigned acknowledges receipt of this Certificate under Section 2-3 of NFPA 306 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed *Louis L. Machal* Date *1-7-97* Signed *[Signature]* Certificate No. *1517*

20M-4-86

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

Printed in USA



WIG. # 1105

SERIAL NO. D 104245

SAFETY S.V. STEAMER TRANSPORTATION 12-19-88  
Survey Requested by Vessel Owner or Agent  
RUSTIE MARINE TANK BARGE SEA TANKERS  
Vessel Type of Vessel Specific Location of Vessel  
Hatchway 01/12/1/1/1/1 10:30 PM  
Last Three (3) Cargoes Test Method Time Survey Completed

BOW BARGE — 0% LEL SAFE FOR WORKERS  
LOOSE MAGNETITE ON BOTTOM  
CARGO TANKS  
No. 1-2-3-4-5 P/B — SAFE FOR WORKERS  
SAFE FOR HOTWORK TO BURN HOLES  
ON DECK WITH FIRE RETARDANT  
CLOTH UNDER ALIGHT TO CATCH FIRE AND  
FIREWATCH WITH WARMED TIREKISE ON  
STAND-BY.  
PUMP ROOM — LOOSE SOFT ASPHALT — 0% LEL  
COFFER DITION — SOFT ASPHALT ON BOTTOM — 0% LEL  
WATER TANKS No. 1-2-3 P/B — SOFT ASPHALT ON BOTTOM — 0% LEL  
DOUBLE BOTTOMS — CLOSED & SECURED  
FUEL TANKS — FULL

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list, paraphrased from NFPA 306 Subsections 1-61 through 1-64, and Subsection 5-3.2).

**SAFE FOR WORKERS:** Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**SAFE FOR HOT WORK:** Means that in the compartment so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable, or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine-room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated: (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**CHEMIST'S ENDORSEMENT.** This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards, on Vessels and have found the condition of each to be in accordance with its assigned designation.

"The undersigned acknowledges receipt of this Certificate under Section 2-3 of NFPA 306 and understands conditions and limitations under which it was issued."

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed [Signature] Date 12/19/88 Signed [Signature] Place 577  
Name Company Date Name Chemist Certificate No.  
NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS  
20M-4-86 Printed in U.S.A.

**SERIAL NO. E 35458**

Date <sup>78</sup>

**Specific Location of Vessel**

Time Survey Completed

Printed in U.S.A.

MARINE CHEMISTS, INC. OF TEXAS  
P.O. BOX 3602 BEAUFORT, TEXAS 77701  
(409) 832-6000, 856-4923, 856-4923  
W. B. HATTON, 537 K. L. MERCER 577

# MARINE CHEMIST CERTIFICATE

SERIAL NO. E 54817

Survey Requested by SRA SHIP, INC. Vessel Owner or Agent W.O. HSE Date 3-9-90  
Vessel ELITABETA S Type of Vessel TANK BARGE Specific Location of Vessel SRA HATTON  
Last Three (3) Cargoes ASPHALT Tests Performed Oil Test, Vapor Time Survey Completed 4:00 PM

AFTER PUMP ROOM

SAFE FOR WORKERS

FOREPEAK

SAFE FOR HOT WORK

CHAIN LOCKED

FIREWATCH WITH CHARGED

PORT AFT FUEL TANK

FIREHOSE REQUIRED

CARGO TANKS 3PAS, 5P

WITH WATER OVER

ALARM ASPHALT

SAFE FOR HOT WORK

SAFE FOR WORKERS

CARGO TANKS 1PAS, 2PAS, 4PAS, 5S

WITH WATER BOTTOM

SAFE FOR HOT WORK

SAFE FOR WORKERS

WITH DOUBLE BOTTOMS #1S, 3S

WITH FIREWATCH & CHARGED

FIREHOSE

SAFE FOR WORKERS

SAFE FOR HOT WORK

WITH DOUBLE BOTTOMS #1P, 2PAS, 3P

SOME RESIDUE WITH AID

VENT (MIN. 1000 CFM)

SAFE FOR WORKERS

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment leading to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed apertures shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list, paraphrased from NFPA 308 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

**SAFE FOR WORKERS:** Means that in the compartment or space so designated, (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**ENTER WITH RESTRICTIONS:** Means that in any compartment or space so designated, entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

**SAFE FOR HOT WORK:** Means that in the compartment so designated, (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces; or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or kerosene tanks, or engine room or the roomy bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable-cyanogenic liquid carrier so designated: (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit; or (b) are inerted.

**CHEMIST'S ENDORSEMENT:** This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 308 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 8-6 of NFPA 308 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed W.B. Hatton Date 3-9-90 Signed W.B. Hatton Date 3-9-90

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

MARINE CHEMISTS, INC., OF TEXAS  
P.O. BOX 3602 BEAUMONT, TEXAS 77704  
(409) 832-5409, 843-2822, 866-4223  
W. B. HATWAY 537 X. L. MERCER 577

# MARINE CHEMIST CERTIFICATE

SERIAL NO. E 35491

Survey Requested by

ELIZABETH S

Vessel

ARMOR (3)

Last Three (3) Cargoes

STEWART TRANSPORTATION

Vessel Owner or Agent

TANK BARGE

Type of Vessel

Oil / Gas / Chemical

Tests Performed

3-16-90

Date

SEA / GULF OF MEXICO

Specific Location of Vessel

12:15 PM

Time Survey Completed

STOW FULL OIL TANK

SAFE FOR WORKERS

SAFE FOR HOTWORK

FORCED AIR VENTILATION REQD. (MIN. 500 CFM)

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS:** (partial list, paraphrased from NFPA 306 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

**SAFE FOR WORKERS:** Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**ENTER WITH RESTRICTIONS:** Means that in any compartment or space so designated, entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

**SAFE FOR HOT WORK:** Means that in the compartment so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate, and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated: (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**CHEMIST'S ENDORSEMENT:** This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

"The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 306 and understands conditions and limitations under which it was issued."

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed

Name

Company

Date

Signed

Marine Chemist

Certificate No.

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

MARINE CHEMISTS, INC. OF TEXAS  
P.O. BOX 3602 BEAUMONT, TEXAS 77704  
(409) 832-6409, 836-4823, 836-4223  
W. B. BATAWAY 507 R. L. MERCER 577

MARINE CHEMIST CERTIFICATE  
WIO 1155  
SERIAL NO. E 55313

Survey Requested by SRA S.V. Vessel Owner or Agent STUART TRAILS Date 3-21-80  
Vessel ELIZABETH S Type of Vessel TANK BARGE Specific Location of Vessel LA  
Last Three (3) Cargoes WILSONIT Tests Performed OIL LAB / WILSONIT Time Survey Completed 3:00 PM

WINE VOID DOUBLE BOTTOMS

No. 1 P, 2 P, 3 P

SAFE FOR WORKERS

SAFE FOR HOTWORK.

FIREWATCH AND CHARGED FIRE HOSE REQ'D.

FORCED AIR VENTILATION REQ'D. (MIN. 1000 CFM)

WINE VOID DOUBLE BOTTOM

No. 2 S

SAFE FOR HOTWORK

FIREWATCH AND CHARGED FIRE HOSE REQ'D.

- ENTER WITH RESTRICTIONS -

ORGANIC LIQUID RESPIRATOR REQ'D.

FORCED AIR VENTILATION REQ'D. (MIN. 1000 CFM)

*Stewart Trans partial*

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the space so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list, paraphrased from NFPA 308 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

**SAFE FOR WORKERS:** Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that (b) toxic materials in the atmosphere are within permissible concentrations; and that (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on this Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**ENTER WITH RESTRICTIONS:** Means that in any compartment or space so designated, entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

**SAFE FOR HOT WORK:** Means that in the compartment so designated, (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated: (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**CHEMIST'S ENDORSEMENT:** This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 308 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 308 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection hereon was completed and is issued subject to compliance with all qualifications and instructions.

Signed Ronald Marshall Date 3-21-80 Signed Stewart Trans Date 3-21-80

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

20M-2-89

CUSTOMER COPY

Printed in U.S.A.

MARINE CHEMISTS, INC. OF TEXAS  
P.O. BOX 3602 BEAUMONT, TEXAS 77704  
(409) 832-3400; 350-4827, 850-4223  
1. D. HAFANAY 537 K. L. MORGAN 577 W. 1176

# MARINE CHEMIST CERTIFICATE

SERIAL NO. E 55214

Survey Requested by SBA SV Vessel Owner or Agent STEWART TANK Date 8-23-90  
Vessel AUNTIE MAME Type of Vessel TANK BARGE Specific Location of Vessel SRA MEMPHIS  
Last Three (3) Cargoes ASPHALT (3) Tests Performed OILCUT/USUAL Time Survey Completed 2:30 PM

FOREPEAK SAFE FOR WORKERS  
NO. 1 D&S LOUISIE BOTTOMS SAFE FOR HOT WORK  
AIR VENT. (MIN. 500 GPM) REQUIRED  
NO. 1 D&S WING TANKS - GENERALLY CLEAN, HAVE  
FORWARD CORRECTION - FIT-WATCH WITH CHARGED  
FOR HOSE ON STANDBY, THEN  
SAFE FOR WORKERS  
SAFE FOR HOT WORK  
AFTER PUMP ROOM - WITH WATER BOTTOM,  
SAFE FOR WORKERS  
SAFE FOR HOT WORK  
ON KEEL RODS  
MAIN DECK - SAFE FOR HOT WORK  
ABOVE MAIN DECK -

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks, or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly exposed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list paraphrased from NFPA 308 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

**SAFE FOR WORKERS:** Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**ENTER WITH RESTRICTIONS:** Means that in any compartment or space so designated, entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

**SAFE FOR HOT WORK:** Means that in the compartment or space so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and (d) the materials as directed on the Marine Chemist's Certificate, and further, that, (e) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire; or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment or space so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated: (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 18.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**CHEMIST'S ENDORSEMENT:** This is to certify that I have personally determined that all spaces in this foregoing list are in accordance with NFPA 308 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

"The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 308 and understands conditions and limitations under which it was issued."

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed Louis Amodeo SBA 8-23-90 Signed W. B. Morgan 537  
Name Capacity Date Marine Chemist License No.

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

MARINE CHEMIST, REG. OF TEXAS  
P.O. BOX 3602 BEAUFORT, TEXAS 77704  
(409) 822-6600 / 455-4832, 856-4223  
W. B. HATWAY 537 T. L. HEPNER 517

# MARINE CHEMIST CERTIFICATE

SERIAL NO. E 55228

SBA S/V  
Survey Requested by  
Vessel NAME  
AS HAIT (3)  
Last Three (3) Cargoes  
STEINERT  
Vessel Owner or Agent  
TANK BARGE  
Type of Vessel  
OIL / VISUAL / REMOTE  
Tests Performed  
8-27-90  
Date  
SBA MEDICAL CO  
Specific Location of Vessel  
12 NOON  
Time Survey Completed

ALL CARGO TANKS IDHS  
2 PDS, 3C  
4 PDS, 5 PDS  
HARD RESIDUE, UNTIL  
AIR VENT (MIN. 1000 CFM)  
SAFE FOR WORKERS  
FOR INSPECTION  
NO DETECTABLE BENZENE

NO. 1 TANK WING TANKS  
NO. 1 PDS CARGO TANKS  
NO. 2 TANK WING TANKS  
NO. 2 P CARGO TANK  
(EQUIPED AREAS)  
(PORT SIDE)  
NO. 3 C CARGO  
(EQUIPED AREAS)  
(PORT SIDE)  
NO. 3 PORT WING  
NO. 2 PORT WING  
STRD SKEG  
AREA WIPED IN CARGO TANKS  
1 PLACE IN EACH CARGO TANK  
WITH FIRMATION WITH CHARLTON  
FIRE HOSE IN EACH WING TANK  
SAFE FOR WORKERS  
SAFE FOR HOT WORK  
ONLY CLEANER AREA SAFE FOR HOTWORK  
OVERHEAD ON 2 PORTING  
SAFE FOR HOT WORK ON STATION  
SAFE FOR HOT WORK  
TO INSTALL INSERT AT TANK  
TOP AROUND MAN HOLE  
HAS WATER BOTTOM UP TO ABBESS  
SAFE FOR HOT WORK

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "hot safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list, paraphrased from NFPA 306 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2).

**SAFE FOR WORKERS:** Means that in the compartment or space so designated, (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**ENTRY WITH RESTRICTIONS:** Means that in any compartment or space so designated, entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

**SAFE FOR HOT WORK:** Means that in the compartment so designated, (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of limited spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire; and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or tube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carriers so designated, (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**CHEMIST'S ENDORSEMENT:** This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 306 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signature: W. B. Hatway SBA 8-27-90  
Name: W. B. Hatway Date: 8-27-90 Marine Chemist: W. B. Hatway Certificate No. 537

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

MARINE CHEMIST, INC. OF TEXAS  
P.O. BOX 1691 DALLAS, TEXAS 75201  
(409) 332-6499 - 332-8222, 332-0220  
W.E. HARTWAT 557 E.L. HORTON 517

# MARINE CHEMIST CERTIFICATE

W.O. 1261 SERIAL NO. F 23837

SEA S.V.  
Survey Requested by

IRON MINE

Vessel

HECHART (3X)

Last Three (3) Cargoes

Vessel Owner or Agent

TANK BARGE

Type of Vessel

On, LA, VESSEL

Tests Performed

Date

12-30-92

Specific Location of Vessel

1:00 PM

Time Survey Completed

No. 2 WING TANKS P/S / SAFE FOR WORKERS  
After Pump Room / SAFE FOR HOTWORK.

PUMP ROOM INSET IN No. 35

CARGO TANK

SAFE FOR WORKERS

\* SAFE FOR HOTWORK

\* FIREWATCH WITH CHARGED FIREHOSE REQUIRED

DOUBLE BOTTOMS UNDER CARGO TANKS

P/S

SAFE FOR WORKERS

No. 3 DOUBLE BOTTOMS P/S / SAFE FOR HOTWORK

FIREWATCH WITH CHARGED FIREHOSE REQUIRED.

FORCED AIR VENTILATION REQUIRED IN WING TANK  
(MIN. 1000 CFM)

These Certificates are ALL For -  
Asphalt Barges - that were cleaned  
For Hot work. For Street Transposition  
which - was sold. (Hired. to work  
with exception of Iron Mine which was  
removed - 3X - double bottom

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

**QUALIFICATIONS:** Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

**STANDARD SAFETY DESIGNATIONS** (partial list, paraphrased from NFPA 308 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

**SAFE FOR WORKERS:** Means that in the compartment or space so designated, (a) the oxygen content of the atmosphere is at least 19.5 percent by volume, and that (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

**NOT SAFE FOR WORKERS:** Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

**ENTER WITH RESTRICTIONS:** Means that in any compartment or space so designated entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

**SAFE FOR HOT WORK:** Means that in the compartment so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inert spaces of where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or tube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

**NOT SAFE FOR HOT WORK:** Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

**SAFE FOR REPAIR YARD ENTRY:** Means that the compartments and spaces of the flammable cryogenic liquid carrier, so designated, (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

**CHEMIST'S ENDORSEMENT:** This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 308 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 308 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all applicable regulations and instructions.

Signed

Name

Company

Date

Signed

Marine Chemist

Certificate No.

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS



**ENCLOSURE B**

**SBA SHIPYARD SUPERFUND SITE  
JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA  
GENERAL NOTICE LETTER**

**SMALL BUSINESS RESOURCES FACT SHEET**



Office of Enforcement and Compliance Assurance  
**INFORMATION SHEET**

## U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies

### Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements

**The National Environmental Compliance Assistance Clearinghouse** provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers  
[www.epa.gov/clearinghouse](http://www.epa.gov/clearinghouse)

**Pollution Prevention Clearinghouse**  
[www.epa.gov/opptintr/library/ppicindex.htm](http://www.epa.gov/opptintr/library/ppicindex.htm)

**EPA's Small Business Ombudsman Hotline** provides regulatory and technical assistance information  
(800) 368-5888

**Emergency Planning and Community Right-To-Know Act**  
(800) 424-9346

**National Response Center** (to report oil and hazardous substance spills)  
(800) 424-8802

**Toxics Substances and Asbestos Information**  
(202) 554-1404

**Safe Drinking Water**  
(800) 426-4791

**Stratospheric Ozone Refrigerants Information**  
(800) 296-1996

**Clean Air Technology Center**  
(919) 541-0800

**Wetlands Helpline**  
(800) 832-7828

### EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost

**EPA's Home Page**  
[www.epa.gov](http://www.epa.gov)

**Small Business Assistance Program**  
[www.epa.gov/ttn/sbap](http://www.epa.gov/ttn/sbap)

**Compliance Assistance Home Page**  
[www.epa.gov/compliance/assistance](http://www.epa.gov/compliance/assistance)

**Office of Enforcement and Compliance Assurance**  
[www.epa.gov/compliance](http://www.epa.gov/compliance)

**Small Business Ombudsman**  
[www.epa.gov/sbo](http://www.epa.gov/sbo)

**Innovative Programs for Environmental Performance**  
[www.epa.gov/partners](http://www.epa.gov/partners)

## Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers (Centers) that provide information targeted to industries with many small businesses. All Centers can be accessed at <http://www.assistancecenters.net>

### Metal Finishing

(1-800-AT-NMFRC or [www.nmfrc.org](http://www.nmfrc.org))

### Printing

(1-888-USPNEAC or [www.pneac.org](http://www.pneac.org))

### Automotive Service and Repair

(1-888-GRN-LINK or [www.ccar-greenlink.org](http://www.ccar-greenlink.org))

### Agriculture

(1-888-663-2155 or [www.epa.gov/agriculture](http://www.epa.gov/agriculture))

### Printed Wiring Board Manufacturing

(1-734-995-4911 or [www.pwbrc.org](http://www.pwbrc.org))

### Chemical Industry

(1-800-672-6048 or [www.chemalliance.org](http://www.chemalliance.org))

### Transportation Industry

(1-888-459-0656 or [www.transource.org](http://www.transource.org))

### Paints and Coatings

(1-800-286-6372 or [www.paintcenter.org](http://www.paintcenter.org))

### Construction Industry

([www.cicacenter.org](http://www.cicacenter.org))

### Automotive Recycling Industry

([www.ecarcenter.org](http://www.ecarcenter.org))

### US / Mexico Border Environmental Issues

([www.bordercenter.org](http://www.bordercenter.org))

## State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org>

## Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses. The Small Business Policy (<http://www.epa.gov/compliance/incentives/smallbusiness>) and

Audit Policy (<http://www.epa.gov/compliance/incentives/auditing>)

## Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201, in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community because the regulated community previously commented on its activities.

## Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

***EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.***

## ENCLOSURE C

### SBA SHIPYARD SUPERFUND SITE JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA PARTIES RECEIVING GENERAL NOTICE LETTER

Allied Towing  
c/o Allied Towing Service LLC  
Francis J Lobrano  
Registered Agent for Allied Towing Service LLC  
147 Keating Dr  
Belle Chasse, Louisiana 70037

Allied Towing  
c/o Allied Towing Service LLC  
12608 Hwy 23  
Belle Chase, Louisiana 70037

Koppers Company Inc  
c/o Beazer East Inc  
Jill M Blundon  
Registered Agent for Beazer East Inc.  
436 Seventh Ave  
Pittsburgh, Pennsylvania 15219

Koppers Company Inc  
c/o Beazer East Inc.  
99 Wood Ave South  
Iselin, New Jersey 08830

Koppers Company Inc  
c/o Beazer East, Inc.  
1910 Cochran Rd., Suite 200  
Pittsburgh, Pennsylvania 15220

Higman Marine Service  
c/o Higman Services Corporation  
CT Corporation System  
Registered Agent for Higman Services Corporation  
5615 Corporate Blvd , Suite 400B  
Baton Rouge, Louisiana 70808

Higman Marine Service  
c/o Higman Services Corporation  
Attn Legal Department  
1980 Post Oak Blvd , Suite 1101  
Houston, Texas 77056

Ingram Barge Co  
CT Corporation System  
Registered Agent for Ingram Barge Co.  
5615 Corporate Blvd., Suite 400B  
Baton Rouge, Louisiana 70808

Ingram Barge Co  
4400 Harding Road  
Nashville, Tennessee 37205

Hall-Buck Marine  
c/o Kinder Morgan Bulk Terminals Inc  
CT Corporation System  
Registered Agent for Kinder Morgan Bulk Terminals Inc.  
5615 Corporate Blvd , Suite 40B  
Baton Rouge, Louisiana 70808

Hall-Buck Marine  
c/o Kinder Morgan Bulk Terminals Inc  
Attn Legal Department  
7116 Hwy 22  
Sorrento, Louisiana 70778

Hollywood Marine Inc ,  
c/o Kirby Inland Marine, LP  
Registered Agent  
d/b/a CSC-Lawyers Incorporating Service Company  
211 E 7th Street, Suite 620  
Austin, Texas 78701-3136

Hollywood Marine Inc  
c/o Kirby Inland Marine LP  
Corporation Service Co.  
Registered Agent for Kirby Inland Marine LP  
320 Somerulos St.  
Baton Rouge, Louisiana 70802-6129

Hollywood Marine Inc  
c/o Kirby Inland Marine LP  
Attn Legal Department  
55 Waugh Dr , Suite 1000  
Houston, Texas 77007

Steuart Transportation Company  
Registered Agent  
National Registered Agents, Inc , of MD  
351 W Camden Street  
Baltimore, Maryland 21201

Steuart Transportation Company  
5454 Wisconsin Avenue, Suite 1600  
Chevy Chase, Maryland 20815

Sabine Towing  
c/o Sabine Towing & Transportation Co. Inc.  
CT Corporation System  
Registered Agent for Sabine Towing & Transportation Co  
Inc  
5615 Corporate Blvd. Suite 400B  
Baton Rouge, Louisiana 70808

Sabine Towing & Transportation Co. Inc.  
c/o Sequa Corporation  
Attn: Legal Department  
300 Blaisdell Rd  
Orangeburg, New York 10962

Sun Oil Company  
c/o Sunoco, Inc  
Corporation Service Company  
Registered Agent for Sunoco, Inc.  
1703 Laurel Street  
Columbia, SC 29201

Sun Oil Company  
c/o Sunoco, Inc  
1735 Market Street, Suite LL  
Philadelphia, Pennsylvania 19103

Sun Oil Company  
c/o Sunoco, Inc  
Kevin Dunleavy, Chief Counsel  
Law Department,  
1735 Market Street, Suite LL  
Philadelphia, PA 19103

Sun Terminals of Louisiana  
c/o Sunoco, Inc  
Corporation Service Company  
Registered Agent for Sunoco, Inc  
1703 Laurel Street  
Columbia, SC 29201

Sun Terminals of Louisiana  
c/o Sunoco, Inc.  
1735 Market Street, Suite LL  
Philadelphia, Pennsylvania 19103

Sun Terminals of Louisiana  
c/o Sunoco, Inc  
Kevin Dunleavy, Chief Counsel  
Law Department  
1735 Market Street, Suite LL  
Philadelphia, PA 19103

State of Louisiana  
Department of Transportation &  
Development (DOTD)  
P O Box 94245  
Baton Rouge, Louisiana 70802

State of Louisiana  
Department of Transportation &  
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